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Document Processing Desk - 6(a)(2)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460-0001

RE: FIFRA § 6(a)(2) Report  
Dursban\* (Formulation Unknown)  
Active Ingredient: Chlorpyrifos  
CAS Registry Number: 002921-88-2  
DERBI No: 41747  
State: MI

DowElanco submits the following information in response to its understanding of the U.S. Environmental Protection Agency's interpretation of FIFRA § 6(a)(2). However, DowElanco has not concluded that this information regards an "unreasonable adverse effect on the environment" or that it is reportable under FIFRA § 6(a)(2).

DowElanco received the following information. Reportedly, an adult male was employed as a pest control operator for seven years and worked with Dursban\* insecticides, Fumitoxin, ZP Tracking Powder, and ZP Rodent Bait. Allegedly, he developed thrombocytopenia which includes disability of body, physical pain and suffering, mental anguish, fright and shock. He allegedly suffers from embarrassment, mortification and humiliation, loss of social and recreational opportunities and enjoyment.

The current DowElanco Dursban insecticide labels state "WARNING. May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Causes eye irritation. Do not get in eyes, on skin or clothing. Avoid breathing dust and spray mist. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse. Keep away from food, feedstuffs and water supplies. ... Do not allow adults, children or pets on treated areas until spray has dried. ... Do not treat pets with this product...Attention: Do not allow adults, children or pets on treated areas until spray has dried."

Additionally, DowElanco provides extensive training programs, videos, and literature to applicators that include specific precautions that must be used when applying this product.

If you wish to discuss this matter further, please call me.

Regards,

*R. A. McCormick*

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